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The Honorable Charles R. Breyer
United States District Judge
Northern District of California
450 Golden Gate Avenue, Dept 6
San Francisco, CA 94102-3483

**Re: In Re: Volkswagen "Clean Diesel" Marketing, Sales
Practices, and Products Liability Litigation
MDL No. 2672**

Dear Judge Breyer:

This brief letter is my introduction to you and represents my application to serve on the Plaintiff's Leadership Committee. A copy of my curriculum vitae is attached. I represent David Thompson, Individually and as a Representative of all Similarly Situated Persons, in the above captioned matter, and pursuant to this Court's Pretrial Order #2, who requests that this Honorable Court appoint him to the Plaintiffs' Steering Committee for this consolidated, multi-district litigation. I hereby represent that I, and the Becnel Law Firm LLC, have and will commit the ample resources necessary to prosecute this litigation, will work cooperatively with the other attorneys involved in this litigation, and have experience in complex litigation including antitrust litigation, mass torts, and class actions.

In 1996, I obtained a juris doctor degree from Louisiana State University Law Center, and am admitted to all Louisiana state courts and federal courts for the Eastern, Western and Middle Districts of Louisiana and U.S. Fifth Circuit Court of Appeals. Additionally, I have been admitted to numerous courts nationwide for the purpose of MDL litigation. I have extensive qualifications to assist in this MDL as I have a thorough knowledge of the workings of federal court as a former clerk in the Eastern District of Louisiana and federal practitioner for over

a decade since my clerkship. I have extensive knowledge not only of the rules of this court but also the electronic procedures including electronic discovery and electronic filing. My relationship with the bench and bar has been enhanced as the past president of the national level of the Federal Bar Association. Through these work experiences and association positions, I acquired great experience in bringing attorneys together to meet on issues and resolve matters. It is this experience and resolve that I believe would be an asset to the Plaintiff's Steering Committee in not only providing excellent communication to the Court of our progress with the litigation but also working together with committee members to accomplish the goals of the litigation for the entire group of Plaintiffs.

The Becnel Law Firm has represented defendants and plaintiffs in state and federal civil rights litigation, antitrust litigation, pharmaceutical and device products liability litigation, toxic tort class actions, administrative and regulatory matters, and intellectual property litigation. We specialize in mass tort litigation and have an excellent relationship with both the defense bar and the scientific and expert community. Our firm has the financial capability as well as the personnel and expert resources to handle this litigation to completion.

The Becnel Law Firm has over 46 years of experience and success in litigating all types of litigation in both state and federal courts. We have litigated antitrust cases, including motion practice, class certification, and trials. Our attorneys and experts are trained and experienced in marketing and business methods and procedures, which are particularly relevant to the issues in this litigation.

My experience in MDL litigation began as early as *In re Propulsid Products Liability Litigation* (MDL No. 1355), continuing to *In re Serzone Products Liability Litigation* (MDL No. 1477), *In re Sulzer Orthopedics Inc. Hip Prothesis and Knee Prothesis Products Liability Litigation* (MDL No. 1401), *In re Welding Rod Products Liability Litigation* (MDL No. 1535), *In re High Sulfur Content Gasoline Products Liability Litigation* (MDL No. 1632), *In re Vioxx Products Liability Litigation* (MDL No. 1657), *In re Bextra and Celebrex Products Liability Litigation* (MDL No. 1691), *In re Ortho Evra Products Liability Litigation* (MDL No. 1724), *In re yasmin and Yaz (Drospirenone) Marketing, Sales, Practices & Products Liability Litigation* (MDL No. 2100), *In re Online DVD Rental Antitrust Litigation* (MDL No. 2034), *In re Comcast Set Top Television Box Antitrust Litigation* (MDL No. 2034), *In re Cox Enterprise, Inc. Set Top Television Box Antitrust Litigation*, *In re FEMA Trailer Formaldehyde Litigation* (MDL No. 1873) and *In re Pool Products Distribution Market Antitrust Litigation* (MDL No. 2328) in all areas of litigation from discovery to final trial preparation and appeals. In the *FEMA Trailer Formaldehyde Litigation*, I served on the Plaintiff's Steering Committee wherein I was appointed by Judge Kurt Engelhardt. I was later appointed to the Plaintiff Steering Committee in the *Pool Products Distribution Market Antitrust Litigation* by Judge Sarah S. Vance. While this litigation is ongoing, my primary tasks are complete allowing

for for myself and our office to dedicate ample time to this litigation.

On September 28, 2015, our firm filed Dennis Thompson, Individually and as a Representative of all Persons Similarly Situated vs. Volkswagen Group of America, Inc., C.A. No. 15-04805 in the Eastern District of Louisiana. After filing the Thompson suit our office immediately prepared supporting papers for the Judicial Panel on Multidistrict Litigation to include this case on its December JPML docket. Additionally, our firm participated in the New Orleans JPML hearing in December, and successfully argued for the consolidation of this matter as an MDL.

Accordingly, the Becnel Law Firm is committed to providing the resources necessary to this litigation and is committed to devoting time and resources to working with other plaintiffs' counsel on the Plaintiffs' Steering Committee, and respectfully prays that this Court appoint Matthew B. Moreland to the Plaintiffs' Steering Committee.

Respectfully submitted,



Matthew B. Moreland